



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

SEP 15 2014

SPECIAL NOTICE LETTER
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
SENT VIA UPS OVERNIGHT #7004 1160 0003 0353 8395

President and Chief Executive Officer
KMG-Bernuth, Inc.
10611 Harwin, Suite 402
Houston, Texas 77036

Re: Special Notice of Potential Liability and Draft Consent Decree
Star Lake Canal Superfund Site
Located in Jefferson County, in and around the cities of Port Neches and Groves, Texas.

Dear Sir:

This is to invite KMG-Bernuth, Inc., a Delaware corporation previously known as KMG Services, Inc., to enter into negotiations with the U. S. Environmental Protection Agency (EPA) to settle its liability and to pay for or perform the cleanup of the Star Lake Canal Superfund Site (Site). The Site is located in Jefferson County, in and around the cities of Port Neches and Groves, Texas. The EPA has determined that beginning during the late 1940s and continuing until the mid-1990s, the release of hazardous substances occurred at the Site. The EPA has determined that KMG-Bernuth, Inc. (hereafter referred to as Respondent) is the successor in interest to Dayburn Chemical Company, Sonford Chemical Company, Idacon, Inc., and Harwin Interests, Inc. The EPA has determined that from March 6, 1962, until Oct 3, 1972, Dayburn Chemical Company and/or Sonford Chemical Company owned and operated a facility that generated and caused hazardous substances to be discharged into the Jefferson Canal. Therefore, Respondent is liable because your predecessors in interest, at the time of their ownership/operations, disposed of hazardous substances and arranged for disposal of hazardous substances at the Site. For these reasons the EPA has determined that Respondent is a Potentially Responsible Party (PRP) under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), 42 U.S.C. § 9607(a) with respect to the Site.

On December 17, 2002, the EPA issued Special Notice Letters to Ameripol Synpol Corporation, Calabrian Corporation, Chevron/Texaco, Inc., IDACON, Inc., H & R Chemicals, Inc., Huntsman Petrochemical Corporation, Jefferson County Drainage District Number 7, and Riverside Chemical Company. The Special Notice Letters called for a Remedial Investigation and Feasibility Study (RI/FS) for the Site. In each letter the EPA notified each addressee of its potential responsibility under Section 107(a) of CERCLA for the cleanup of the Site, including all past costs incurred by the EPA in responding to releases at the Site. On December 22, 2005, Huntsman Petrochemical Corporation, Chevron Environmental Management Company (CEMC) for itself and on behalf of Texaco Incorporated (ultimate successor being Chevron Corporation), and the EPA signed an Administrative Order on Consent (AOC) to perform the RI/FS.

CEMC and Huntsman Petrochemical LLC (previously Huntsman Petrochemical Company) submitted The Final Feasibility Study Report (FS Report) on June 4, 2012. The EPA is now contacting Respondent to offer the company an opportunity to enter into negotiations to pay for or to perform the selected response and resolve Respondent's liability for the Site.

Background

The Star Lake Canal Superfund Site (Site) is located in Jefferson County, in and around the cities of Port Neches and Groves, Texas. During World War II, the United States contracted for the construction and operation of a synthetic rubber production facility located on land adjacent to and incorporating portions of the Site. The facility comprised a butadiene plant, where byproducts from nearby petroleum refineries were fractionated into butadiene and other hydrocarbons, and two copolymer plants, where the butadiene was mixed with styrene to form synthetic rubber (collectively, "the rubber plants"). The Star Lake Canal was also constructed during this time, for the disposal of wastewater, cooling water, and sewage from the rubber plants. In addition to the rubber plants, several chemical companies owned land adjacent to the Star Lake and Jefferson Canals, and operated chemical plants on those properties. Wastewater, cooling water, and sewage were discharged from those properties into Star Lake and Jefferson Canals. The Site has been divided into seven Areas of Investigation (AOI): Jefferson Canal, Jefferson Canal Spoil Pile, Former Star Lake, Star Lake Canal, Gulf States Utility Canal, Molasses Bayou Waterway, and the Molasses Bayou Wetland. The Site location and the boundaries of the seven AOIs are shown in Figures One and Two of the enclosed copy of the Record of Decision (ROD) for the Site (Enclosure 2, Exhibit 1). The Site is defined as the lengths of the two industrial canals from their origins to the confluence of Star Lake Canal with the Neches River and the adjacent wetlands. The straight-line distance along Star Lake Canal from its origin east of the intersection of Highway 136 and FM 366 to its confluence with the Neches River is approximately 16,500 feet. The straight-line distance along Jefferson Canal from its origin on the east side of Hogaboom Road south of FM 366 to its confluence with Star Lake Canal north of the Hurricane Protection Levee is approximately 4,000 feet. Molasses Bayou is located southeast of the Star Lake Canal and intersects the canal in two locations. The Gulf States Utility Canal is a canal that resulted during the recent placement of a buried utility line and is located parallel to and approximately 100-200 feet northwest of the Star Lake Canal. The Gulf States Utility Canal extends from the Neches River to a point approximately 500 feet downstream from Sara Jane Road.

The FS Report identified hazardous substances at the Site that included acenaphthene, acenaphthylene, acetone, aldrin, anthracene, arsenic, barium, benzene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)pyrene, benzo(k)fluoranthene, chromium, chrysene, copper, cyanide, 4,4'-DDD, endosulfan I, ethylbenzene, fluoranthene, fluorene, heptachlor, heptachlor epoxide, indeno(1,2,3-cd)pyrene, mercury, 2-methylnaphthalene, naphthalene, aroclor-1254 (a polychlorinated biphenyl [PCB]), phenanthrene, pyrene, selenium, silver, styrene, thallium, toluene, and total xylenes. These contaminated sediments extend more than 2 miles, spanning portions of Jefferson Canal, Star Lake Canal, and Molasses Bayou to within 1/4 of a mile of where Molasses Bayou, Star Lake Canal, and the Neches River converge. More than 3 miles of wetlands front the surface water in which contaminated sediments have been detected. These wetlands are habitats known to be used by the white-faced ibis, a State-designated threatened species. From the confluence of the Molasses Bayou, Star Lake Canal, and the Neches River, surface water flows downstream approximately 3-1/2 miles to Sabine Lake. Sabine Lake is used as a fishery and produced more than 1 million pounds of fish and shellfish in 1996. Some of the contaminants present at the Site are known human carcinogens.

Opportunity to Negotiate

On behalf of the EPA, I am offering Respondent this opportunity to enter into negotiations because the EPA believes Respondent may be responsible for the cleanup of the Site under the Superfund Law. I have enclosed a "Special Notice" (Enclosure 1) which explains that responsibility more completely. Please note that all exhibits to the special notice can be found on the enclosed CD-ROM (Enclosure 2). This notice also explains the purpose of the enclosed Draft Consent Decree. Consistent with sections 121(1) and 122(j) of CERCLA 42 U.S.C. §§9621(f), 9622(j), and EPA policy, the EPA has invited the State of Texas to participate as a party to these settlement negotiations, however, the State of Texas has declined the EPA's offer to participate.

Please have your legal counsel contact Mr. Edwin Quinones, Assistant Regional Counsel, at (214) 665-3137, within ten days of receipt of this letter and let him know whether you plan to submit a good-faith offer to the EPA and will attempt to negotiate an agreement with the EPA on this matter.

The enclosed notice requires you to submit a written good-faith offer within 60 days of your receipt of this letter. The notice explains what the EPA means by a good-faith offer. Note that the notice includes a demand for payment; this allows the EPA to preserve certain legal rights. I urge you to read the enclosed notice carefully.

My staff will be available to meet with you at 1:00 p.m. on October 29, 2014, at the EPA office in Dallas, Texas. At that time my staff will explain the Superfund program and the special notice process and will respond to any questions you may have. If you wish to meet, please contact Mr. Robert Werner, Enforcement Officer, at (214) 665-6724, to make arrangements. If you have legal questions, please call Mr. Quinones at (214) 665-3137. If you have technical questions about the Record of Decision, please contact Mr. Gary Miller, Remedial Project Manager, at (214) 665-8318. If you have any other questions regarding this letter, you may contact Mr. Werner.

My staff and I look forward to working with you during the coming months.

Sincerely yours,



Carl Edlund, P.E.
Director
Superfund Division

Enclosures (2)

cc: Mr. Kevin Kirsch
Branch Chief, SE/Gulf of Mexico
National Oceanic and Atmospheric Administration

Mr. Mike Smith
Natural Resource Trustee (lead administrative trustee)
Texas Commission on Environmental Quality

Ms. Jane G. Sarosdy
Director, Natural Resource Damage Assessment Trustee Program
Texas General Land Office

Ms. Chelsea Murphy
GLO Oil Spill Prevention and Response
Texas GLO

Mr. Don Pitts
Program Director
Texas Parks and Wildlife Department

Mr. Andy Tirpak
Environmental Assessment, Response, and Restoration Program
Texas Parks and Wildlife Department

Mr. Stephen R. Spencer
Regional Environmental Officer
United States Department of Interior

Ms. Clare Lee
Lead for USFWS
United States Fish and Wildlife Service

Mr. Barry Forsythe
c/o USEPA
United States Fish and Wildlife Service

Mr. Kent Becher
c/o USEPA
United States Geological Survey

**ENCLOSURE 1
SPECIAL NOTICE FOR
REMEDIAL DESIGN AND REMEDIAL ACTION
STAR LAKE CANAL SUPERFUND SITE
LOCATED IN JEFFERSON COUNTY, IN AND AROUND THE CITIES OF
PORT NECHES AND GROVES, TEXAS**

This notice is from the U.S. Environmental Protection Agency (EPA) to KMG-Bernuth, Inc., a Delaware corporation previously known as KMG Services, Inc. The use of "you" and "your" in this notice refers to KMG-Bernuth, Inc. This notice informs and requests the following six things:

1. You may be responsible for the cleanup of hazardous substances, including acenaphthene, acenaphthylene, acetone, aldrin, anthracene, arsenic, barium, benzene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)pyrene, benzo(k)fluoranthene, chromium, chrysene, copper, cyanide, 4,4'-DDD, endosulfan I, ethylbenzene, fluoranthene, fluorene, heptachlor, heptachlor epoxide, indeno(1,2,3-cd)pyrene, mercury, 2-methylnaphthalene, naphthalene, aroclor-1254 (a polychlorinated biphenyl [PCB]), phenanthrene, pyrene, selenium, silver, styrene, thallium, toluene, and total xylenes at the Star Lake Canal Superfund Site (Site). This notice is issued under the Comprehensive Environmental Response, Compensation, and Liability Act, which is abbreviated as "CERCLA." CERCLA is also known as Superfund.
2. You are responsible for reimbursing the EPA for costs it has incurred at the Site.
3. The EPA has an Administrative Record (AR) you may review.
4. The EPA will use special notice procedures when it works with you. This means that, as part of these procedures, the EPA will not take certain types of actions at the Site for 60 days from the day you get this notice.
5. You are responsible for providing the EPA a good-faith offer within 60 days from the day you receive this notice.
6. The EPA has provided you contact information.

The following six sections provide additional detail.

I. NOTICE THAT YOU MAY BE LIABLE

CERCLA says that four types of persons are liable for cleaning up (or paying the EPA to clean up) hazardous substances that have been released. The four types of liable persons are:

1. Persons who now own the place where the hazardous substance was released;
2. Persons who once owned or operated the place where the hazardous substance was released during the time when the hazardous substance was disposed of;
3. Persons who arranged for disposal or treatment of hazardous substances at the place where the hazardous substance was released; or

4. Persons who selected the place where the hazardous substance was released as a disposal site and transported the hazardous substances to that place.

The EPA's term for these persons is Potentially Responsible Parties or PRPs.

You may want to read the section of the CERCLA law, which tells which persons are liable for the cost of cleaning up hazardous substances. CERCLA can be found in Sections 9601 through 9675 of Title 42 of the United States Code (U.S.C.). The definitions of terms used in CERCLA are found in section 9601, while the discussion of responsible parties can be found at Section 9607. Section 9607 is sometimes called Section 107, as it is enumerated in the act of Congress.

CERCLA also says that the EPA may order responsible persons to take response actions which the EPA believes are needed to protect human health, welfare, or the environment. For example, the EPA may issue an order (i.e., Unilateral Administrative Order) that requires a responsible person to conduct the Remedial Design and Remedial Action (RD/RA) in order to implement the remedial action selected by the EPA in its Record of Decision (ROD) for the Site. If a responsible person does not comply with an EPA order, the person may be fined up to \$37,500.00 per day. In addition, if a responsible person does not comply with an EPA order, that person may also be liable for three times the amount of money which the EPA spends on the cleanup.

The part of CERCLA which tells about orders which the EPA may issue can be found at Section 9606 of Title 42 of the United States Code. Section 9606 gives authority to the President, but the President has delegated that authority to the EPA. Section 9606 is sometimes referred to as Section 106, as it is enumerated in the act of Congress.

The EPA has determined that you are the successor in interest to Dayburn Chemical Company, Sonford Chemical Company, Iacon, Inc., and Harwin Interests, Inc. The EPA has determined that from March 6, 1962, until Oct 3, 1972, Dayburn Chemical Company and/or Sonford Chemical Company owned and operated a facility that generated and caused hazardous substances to be discharged into the Jefferson Canal and ultimately into the Star Lake Canal. Therefore, you are liable because your predecessors in interest, at the time of ownership and operation, disposed of hazardous substances and arranged for disposal of hazardous substances at the Site. The described canals are within the Site's boundaries. One and/or both canals are contaminated with hazardous substances that include acenaphthene, acenaphthylene, acetone, aldrin, anthracene, arsenic, barium, benzene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(g,h,i)pyrene, benzo(k)fluoranthene, chromium, chrysene, copper, cyanide, 4,4'-DDD, endosulfan I, ethylbenzene, fluoranthene, fluorene, heptachlor, heptachlor epoxide, indeno(1,2,3-cd)pyrene, mercury, 2-methylnaphthalene, naphthalene, aroclor-1254 (a polychlorinated biphenyl [PCB]), phenanthrene, pyrene, selenium, silver, styrene, thallium, toluene, and total xylenes. The preceding determinations are based upon findings from the EPA's PRP search activities, information provided to the EPA in your 104(e) Information Request Response (Enclosure 2, Exhibit 2), and findings from The Final Feasibility Study Report (Enclosure 2, Exhibit 3).

In accordance with the ROD, the Superfund Law, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), you are responsible for the costs of cleaning up the Site. The EPA demands payment of all outstanding past response costs and intends to seek an agreement from you to pay all future response costs, including cost of oversight as a part of the

anticipated settlement. The EPA has selected a cleanup approach for the Site, which is described in the ROD issued by the EPA on September 30, 2013. A copy of the ROD for the Site is included on Enclosure 2, Exhibit 1 to this letter.

As the responsible EPA official with delegated authority, I have determined that the Site presents an imminent and substantial endangerment to public health, welfare, and the environment, and, therefore must be cleaned up. You will be required to conduct a RD/RA in accordance with the ROD, the Superfund Law, and the NCP, and to furnish all necessary personnel, materials, and services necessary for, and incidental to, the performance of the RD/RA. In carrying out your work, you will be guided by the Consent Decree and Statement of Work discussed in more detail below, as well as by appropriate EPA policy and guidance.

The EPA invites you to take stock of the evidence on Enclosure 2, Exhibit 4 and to enter into negotiations toward a settlement which may be in your best interests. Settling with the EPA may protect you from other responsible parties who may sue you to recover costs they incur in cleaning up the Site. In addition, as we said above, if you choose not to settle with the EPA and you are found to be a responsible party, the EPA may take civil administrative action against you.

II. DEMAND FOR REIMBURSEMENT OF COSTS

In accordance with Section 104 of CERCLA, 42 U.S.C. § 9604, the EPA has already taken certain response actions and incurred certain costs in response to conditions at the Site. You are responsible for reimbursing the United States Government for the response costs associated with these actions. These response actions include without limitations: drafting of the proposed plan; review of and response to comments concerning the proposed plan; and, drafting of the Record of Decision. These response activities also include associated administrative, finance, and enforcement activities and their costs. The EPA is seeking to recover from you its response costs and all the interest authorized to be recovered under Section 107(a) of CERCLA. The approximate total response costs identified from the Site's inception through May 31, 2014, for the Site are \$1,508,192.08. A summary of these costs can be found on Enclosure 2, Exhibit 5. Of this amount, identified PRPs have paid \$684,163.35 to the EPA. To date the EPA's net unrecovered response cost for this Site is \$824,028.73. Under Section 107(a) of CERCLA, the EPA hereby makes a demand for payment from you for \$824,028.73 plus all interest authorized to be recovered under Section 107(a).

Some or all of the costs associated with this notice may be covered by current or past insurance policies issued to you or your predecessors. Most insurance policies will require that you timely notify your carrier(s) of a claim against you. To evaluate whether you should notify your insurance carrier(s) of this demand, you may wish to review current and past policies. Coverage depends on many factors, such as the language of the particular policy and state law.

In the event that you file for protection in a bankruptcy court, you must include the EPA as a creditor, because the EPA has a potential claim against you. The EPA reserves the right to file a proof of claim or application for Reimbursement of Administrative Expenses.

Please make your payment for \$824,028.73 by certified check made payable to "EPA Hazardous Substance Superfund," and reference CERCLA Site ID Number 06GY. Other methods of payment are available and information may be requested by contacting Mr. Robert Werner, Enforcement Officer, at 214-665-6724. Send the certified check to:

U.S. Environmental Protection Agency
Superfund Payments
Cincinnati Finance Center
P.O. Box 979076
St. Louis, MO 63197-9000

Send a copy of the check to:

Section Chief, Enforcement Assessment Section (6SF-TE)
Superfund Division
U.S. Environmental Protection Agency
1445 Ross Avenue
Dallas, Texas 75202-2733

III. ADMINISTRATIVE RECORD

In accordance with Section 113 of CERCLA, 42 U.S.C. § 9613, the EPA has established an Administrative Record containing the documents that serve as the basis for the EPA's selection of the appropriate response action for the Site. You may wish to review the Administrative Record to assist you in responding to this letter, but your review should not delay such response beyond the 60-day period provided by CERCLA. This Administrative Record is located at:

Port Neches Effie & Wilton Hebert Public Library
2025 Merriman Street
Port Neches, Texas 77651
(409) 722-4554

Texas Commission on Environmental Quality
Central File Room
12100 Park 35 Circle
Austin, Texas 78753
512-239-1000

U.S. Environmental Protection Agency – Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202
(214) 665-6427

IV. NEGOTIATION PERIOD

Under CERCLA, the EPA may use special notice procedures when these procedures would help reach an agreement with PRPs. The special notice procedures are described in Title 42 of the United States Code at Subsection 9622(e). The powers given to the President by CERCLA Subsection 9622(e) have been delegated to the EPA. Subsection 9622(e) is sometimes called Subsection 122(e), as it is enumerated in the act of Congress.

The EPA has decided that special notice procedures may help the EPA and you reach a settlement for this Site. As part of the special notice procedures, the EPA will not take certain types of actions at the Site for 60 days from the day you get this notice. During these 60 days, the EPA invites you to settle the EPA's claims. The EPA will extend this 60-day period for 60 more days if the EPA gets a good-faith offer from you within 60 days from the day you receive this notice. The items which you must put in a good-faith offer are described in Section V (GOOD-FAITH OFFER) of this letter.

If you and the EPA reach settlement within the 120-day negotiation period (it is a 120-day period) because it includes the first 60-day period plus the 60-day period which the EPA may add if you submit a good-faith offer), the settlement will be written as a judicial consent decree. If approved, the Consent Decree would be signed and entered by a U.S. District Judge in United States District Court in conjunction with the simultaneous filing of a civil complaint.

To help negotiations get started, I have enclosed a draft Consent Decree (Enclosure 2, Exhibit 6) that has been tailored by the EPA and the U.S. Department of Justice (DOJ) to apply specifically to the Site. I have also included a draft comprehensive RD/RA Statement of Work (SOW) (Enclosure 2, Exhibit 7) which describes the work that needs to be done. The work includes the performance of an RD/RA to implement the Site remedy as set forth in the ROD, in accordance with the Superfund Law, the NCP, and the EPA policy and guidance.

V. GOOD FAITH OFFER

The enclosed draft Consent Decree and draft SOW should help you make a good-faith offer to do the RD/RA for the Site. To accelerate the EPA's review of your good-faith offer, please send us any suggested revisions to the draft Consent Decree and draft SOW. You can revise the draft Consent Decree or draft SOW by marking through the parts which you want to omit, and by adding new text in a way which facilitates the EPA's recognition of the new text. If you use Microsoft Word, which is used by the EPA, or other similar word processing software for PC equipment, please send us a redline-strikeout version that incorporates any of your suggested modifications.

In order for your offer to be a good-faith offer, it must be in writing and it must include the following:

1. An unconditional statement that you are willing to do or pay for the RD/RA. Your statement must be in keeping with the EPA's draft Consent Decree and draft SOW. Your statement must be a good basis for more negotiations.

2. A paragraph-by-paragraph response to the EPA's draft Consent Decree and draft SOW (a redline-strikeout version of the draft Consent Decree and draft SOW will suffice). In addition, please identify which changes are major issues for you.
3. Proof that you (or the party you will hire to do the work) have the technical skills to do the RD/RA. If you will hire another party, please tell us whom, or tell us how you will pick that party.
4. A written statement that you are willing to pay the EPA for response costs previously paid at the Site and to pay the EPA in overseeing the conduct of the RD/RA.
5. Proof that you can pay for the RD/RA (an audited annual report may be acceptable).
6. A statement that you are willing to begin work on the RD/RA in keeping with the schedule set in the attached draft Consent Decree and draft SOW.
7. A general work plan, which describes how and when you will do the major parts of the RD/RA described in the draft Consent Decree and draft SOW.
8. The name, address, and phone number of the party who will represent you in negotiations, if you will use a representative.

To save time and expense, please use your first good-faith offer to make all the changes which you would like to see in the draft Consent Decree and draft SOW. The EPA may not make changes you ask for at a later date.

If we decide that a good-faith offer has not been submitted within 60 days from the day you get this letter, we may end the negotiation period and begin response or enforcement actions.

VI. WHERE TO SEND YOUR GOOD-FAITH OFFER AND WHO TO CALL AT EPA

Please call Mr. Edwin Quinones at the EPA within ten (10) business days of receipt of this correspondence and let him know whether you plan to submit a good-faith offer and will attempt to negotiate an agreement with the EPA for the Site. Please send your good-faith offer to Mr. Quinones at the address listed below. As discussed above, you have 60 days from your receipt of this notice to send the EPA a written good-faith offer.

If the EPA does not receive a good-faith offer from you within 60 days from your receipt of this notice, the EPA will assume that you do not wish to negotiate. The EPA may then take response or enforcement actions as explained above in section 1 of this notice. If the EPA does the RD/RA (or any other action for the Site) you may be liable for the EPA's costs plus interest, as well as any other sanctions or penalties that may apply.

You should send your response to this notice to:

Mr. Edward Quinones, Assistant Regional Counsel
Office of Regional Counsel (6RC-S)
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
(214) 665-3137
FAX (214) 665-6460


The discussions of fact or law in this notice are meant to help you understand CERCLA and the EPA's actions at the Site. The discussions of fact and law are not final EPA positions on any matter discussed in this notice. If you or your attorney have legal questions about this notice, please contact Mr. Quinones. Questions concerning the technical aspects of the selected remedy from the ROD should be directed to:


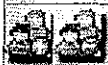





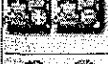






Mr. Gary Miller
Remedial Project Manager
Superfund Division (6SF- RA)
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733
(214) 665-8318
FAX (214) 665-6660

If you have any other questions regarding this notice, you may contact Mr. Werner, Enforcement Officer, at (214) 665-6724. Thank you for your prompt attention to this important legal matter.

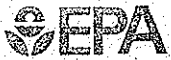
ENCLOSURE 2
EXHIBITS TO THE SPECIAL NOTICE ON THE ENCLOSED CD-ROM
FOR REMEDIAL DESIGN AND REMEDIAL ACTION
STAR LAKE CANAL SUPERFUND SITE
LOCATED IN JEFFERSON COUNTY, IN AND AROUND THE CITIES OF
PORT NECHES AND GROVES, TEXAS

- | | |
|------------|---|
| Exhibit 1: | Record of Decision |
| Exhibit 2: | Evidence (See index on attached CD) |
| Exhibit 3: | Final Feasibility Study |
| Exhibit 4: | Summary of Past Costs from inception through May 31, 2014 |
| Exhibit 5: | Draft Consent Decree |
| Exhibit 6: | Draft Statement of Work |

Routing and Concurrence Slip	Begin Routing Date: 09/02/2014
Routing Status: Closed 	

To: (Name, office symbol, route number, building, Agency/Post)	Initials	Date
 1. Linda Brewer	LB	09/02/2014
 2. Robert Werner	RW	09/11/2014
 3. Lawrence Andrews	LA	09/08/2014
 4. Garyg Miller	GM	09/08/2014
 5. Edwin Quinones	EQ	09/11/2014
 6. Lydia Johnson	LJ	09/09/2014
 7. Carlos Sanchez	CS	09/09/2014
 8. John Meyer	JM	09/09/2014
 9. Ben Banipal	BB	09/09/2014
 10. Mark Peycke	MP	09/11/2014
 11. Stephanie Delgado		
 12. Pam Phillips /s Linda Brewer	LB	09/15/2014
 13. Carl Edlund		
 14.		

Office:	<input type="checkbox"/> Risk & Site Assessment Section
Tracking Category:	<input type="checkbox"/> Special Notice for RD/RA
Enforcement Confidential:	<input type="radio"/> Yes <input checked="" type="radio"/> No
Email Subject:	Star Lake Canal Special Notice Letters (8)
Due Date:	09/16/2014
DD/DDD Assigned:	
DD/DDD Status:	Pending
DD/DDD Remarks:	
Front Office Assigned:	

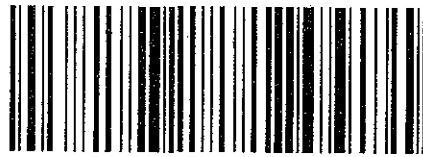


United States
Environmental Protection Agency
Region 6
1445 Ross Ave, Ste 1200
Dallas, Tx 75202-2733

<http://www.epa.gov/region6>
1-800-887-6063

REPLY TO MAIL CODE: 657E

Official Business
Penalty for Private Use \$300
An Equal Opportunity Employer



7004 1160 0003 0353 8395

President and Chief Executive Officer
KMG-Bernuth, Inc.
10611 Harwin, Suite 402
Houston, Texas 77036